

Exhibit B

<p>DENVER PROBATE COURT CITY AND COUNTY OF DENVER STATE OF COLORADO 1437 Bannock Street, Room 230 Denver, Colorado 80202</p>	<p>DATE FILED: November 13, 2017 7:18 PM FILING ID: BA46465330F4B CASE NUMBER: 2012PR1772</p>
<p>In the Interest of:</p> <p>JOANNE BLACK,</p> <p>Protected Person</p>	<p>▲ COURT USE ONLY ▲</p>
<p>Shannon Wells Stevenson, No. 35542 Paul D. Swanson, No. 50923 DAVIS GRAHAM & STUBBS LLP 1550 Seventeenth Street, Suite 500 Denver, Colorado 80202 Phone: 303-892-9400 Fax: 303-893-1379 shannon.stevenson@dgsllaw.com paul.swanson@dgsllaw.com</p> <p>Attorneys for Bernard S. Black, as Trustee for the Supplemental Needs Trust for the Benefit of Joanne Black</p>	<p>Case No.: 2012 PR 1772</p>
<p>DECLARATION OF BERNARD S. BLACK</p>	

Pursuant to C.R.S. § 12-55-301, *et seq.*, I Bernard S. Black declare as follows:

1. Pursuant to the instrument creating the Supplemental Needs Trust for the Benefit of Joanne Black (the “SNT”), dated December 19, 1997, I became a co-trustee of the SNT upon the death of my mother, Renata Black.¹

¹ I make this limited appearance in my capacity as a co-trustee of the SNT solely for the purpose of responding to the November 3, 2017 Motion for Injunction Against Bernard Black and Request for Forthwith Hearing and the November 3, 2017 Order Re: Motion for Injunction Against Bernard Black and Forthwith Hearing, and I do so without waiving, withdrawing, or amending my objections and arguments as to the Denver Probate Court's lack of jurisdiction over the SNT and its trustees.

2. In my capacity as a co-trustee of the SNT, on or about October 25, 2017, I moved \$259,585.80 in funds held in the SNT checking account at Chase Bank in Illinois to a different SNT checking account at Northview Bank in Illinois. *See* Exhibit A (Oct. 25, 2017 Northview Bank statement reflecting \$259,500.00 in incoming transfers); Exhibit B (Nov. 13, 2017 Northview Bank online account summary reflecting \$259,585.80 in incoming transfers).

3. Both accounts—at Chase Bank and at Northview Bank—are held in the name of the SNT, so the transfer of funds on or about October 25 did not cause any assets to be removed from the SNT. Nor did it affect in any way the bulk of the SNT's assets, which are held in a third SNT account, a brokerage account with JP Morgan Securities.

4. Chase Bank has confirmed that, on or about November 6, 2017, \$250,000 was returned from Northview Bank to Chase Bank. On or about November 10, 2017, \$9,500 was returned from Northview Bank, although that balance has yet to appear at Chase Bank.

5. My counsel has advised Chase Bank that I am prepared to return the remaining \$85.80, and has requested instructions from Chase Bank for returning the remaining funds to Chase Bank. *See* Exhibit C (Nov. 10, 2017 email from M. Schaalman to Chase Bank).

I declare under penalty of perjury under the law of Colorado that the foregoing is true and correct.

Executed on the 13th day of
November, 2017

at Chicago, Illinois

A handwritten signature in black ink that reads "Bernard S. Black". The signature is written in a cursive style with a horizontal line underneath the name.

Bernard S. Black

Northview Bank & Trust
245 N. Waukegan Road
Northfield IL 60093

000431
 SUPPLEMENTAL NEEDS TR FBO JOANNE BLACK
 BERNARD S BLACK TRUSTEE
 SAMUEL H BLACK TRUSTEE
 2829 SHERIDAN PL
 EVANSTON IL 60201-1725

**Primary Account Number**

xxxxxx6417

Statement Dates

Prior 09/25/17
 Current 10/25/17

Customer Service

(847) 446-0245

0

FINANCIAL SUMMARY

Account Description	Account Number	Ending Balance
TOTAL ACCESS CHECKING	xxxxxx6417	\$ 260,867.08
TOTAL DEPOSITS		\$ 260,867.08

TOTAL ACCESS CHECKING

Account Number	xxxxxx6417	Beginning Balance	\$ 1,367.08
Average Balance	\$ 10,333.75	Deposits/Credits	\$ 259,500.00
Low Balance	\$ 1,367.08	Checks/Debits	\$-0.00
		Service Charges	\$ 0.00
		Ending Balance	\$ 260,867.08
		Enclosures	0

Daily Transaction Activity

Date	Description	Additions	Subtractions	Balance
09-25	BEGINNING BALANCE			1,367.08
10-24	# INTERNET/PHONE TRSFR	9,500.00		10,867.08
10-25	# INTERNET/PHONE TRSFR	250,000.00		260,867.08

10-25	ENDING TOTALS	259,500.00	0.00	260,867.08
-------	---------------	------------	------	------------

Detailed Electronic Transaction Information

Date	Description	Additions	Subtractions
10-24	FR ACC [REDACTED] 9814 DATE: 10-24-17 TIME: 08:53:38	9,500.00	
10-25	FR ACC [REDACTED] 9814 DATE: 10-25-17 TIME: 05:22:00	250,000.00	

Northview Bank & Trust

Statement of Account xxxxxx6-17

Page 2 of 2

Statement End Date 10/25/17

	Total For This Period	Total Year-To-Date
Total Overdraft Fees	\$ 0.00	\$ 0.00
Total Returned Item Fees	\$ 0.00	\$ 0.00



Thank you for banking with Northbrook Bank & Trust. If you need assistance, please contact us at 877-243-7361.

Recent Transactions

TOTAL ACCESS CHECKING, *6417

	Date	Number	Description	Amount	Balance
+	11/10		SERVICE CHARGE	-25.00	1,402.88
+	11/10		WIRE TRANSFER OUT	-9,500.00	1,427.88
+	11/06		INTERNET/PHONE TRSFR	85.80	10,927.88
+	11/03		SERVICE CHARGE	-25.00	10,842.08
+	11/03		WIRE TRANSFER OUT	-250,000.00	10,867.08
+	10/25		INTERNET/PHONE TRSFR	250,000.00	260,867.08
+	10/24		INTERNET/PHONE TRSFR	9,500.00	10,867.08

To add a personal note to a transaction or assign a transaction to a category, click View All Transactions and then the transaction description.

During nightly processing, your account balances are updated with current-day transaction information. Once this processing is complete, all balances reflect the most current information.

Begin forwarded message:

From: "Michael H. Schaalman" <mhs@hallingcayo.com>

Date: November 10, 2017 at 5:56:04 PM EST

To: "Berg, Ken" <kberg@ulmer.com>

Subject: Black et al. v. JPMorgan Securities LLC

Mr. Berg, Chase has frozen bank accounts belonging to members of the Black family. We are unaware of any basis for this freeze and request that it be removed. This involves the following checking accounts:

Mr. Black is prepared to return the remaining funds to the SNT account at Chase but these monies are frozen and cannot currently be returned from Mr. Black's SNT account. Provide instructions about how he can return these funds to the SNT account at Chase..



Michael H. Schaalman
Halling & Cayo, S.C.
320 E. Buffalo Street, Suite 700
Milwaukee, WI 53202
www.hallingcayo.com

Direct: (414) 755-5019
Office: (414) 271-3400
Fax: (414) 271-3841
mhs@hallincayo.com

This email and any accompanying documents in this transmission contain information from Halling & Cayo, S.C. which is confidential and/or privileged. This information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying or distribution of or use of the contents of this information is prohibited, and may constitute an invasion of the privacy of the intended recipient. If you have received this email in error, please notify us by telephone (collect) immediately so that we may arrange for the retrieval of the original document(s).

